

## EXHIBIT 55

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION  
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IN RE: NATIONAL PRESCRIPTION MDL No. 2804  
OPIATE LITIGATION

Case No.  
17-md-2804

Judge Dan Aaron  
Polster

This document relates to:

The County of Cuyahoga v. Purdue Pharma, et  
al., Case No. 17-OP-45004

City of Cleveland, Ohio v. Purdue Pharma L.P.,  
et al., Case No. 18-OP-45132

The County of Summit, Ohio, et al. v. Purdue  
Pharma L.P., et al., Case No. 18-OP-45090

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Videotaped Deposition of  
KIMBERLY PATTON  
January 22, 2019  
9:13 a.m.

Taken at:  
Brennan Manna & Diamond  
75 East Market Street  
Akron, Ohio

Stephen J. DeBacco, RPR

<p style="text-align: right;">Page 266</p> <p>1 was created. And then they would run it if an  2 individual came in with substance use as part  3 of the admission data, they would run that  4 report at admission.  5 Q. So as far as you know, as soon as  6 an OARRS report data was available for use, the  7 psychiatrist at Northcoast Behavioral  8 Healthcare started using it?  9 A. That's my understanding.  10 MS. KEARSE: Object to form.  11 Q. Okay. You mentioned earlier in  12 your testimony a little bit about dispensing  13 and pharmacies dispensing prescription opioids.  14 Would you agree that it can be  15 appropriate for pharmacists to stock and to  16 fill prescriptions for opioids?  17 A. Yes.  18 MS. MORRISON: I may be done. Let  19 me go off the record for a few minutes to  20 confer with my colleagues.  21 THE WITNESS: Okay.  22 MS. MORRISON: Thank you.  23 THE VIDEOGRAPHER: Off the record,  24 4:10.  25 (A recess was taken.)</p>	<p style="text-align: right;">Page 268</p> <p>1 for Counsel.  2 A couple, just, things I want to  3 clarify.  4 Counsel for Teva asked you  5 questions about prevention programs provided by  6 the ADM specific to opioids. Do you recall  7 that line of questioning?  8 A. Yes.  9 Q. Do ADM programs, do the prevention  10 programs that ADM does provide, do they include  11 components that deal specifically with opioids?  12 A. Yes. They do -- the prevention  13 programs that are funded through ADM Board do  14 address opioids, as well as other substances.  15 Q. And are there ADM-targeted  16 prevention grants, meaning that ADM actually  17 provides grants and pays for prevention  18 programs that are specific to opioids?  19 MS. FEINSTEIN: Objection. Form.  20 A. So we do have targeted prevention  21 grants. They have been in place since I've  22 been employed at ADM Board. And to my  23 knowledge, 2015-'16, school year, there --  24 Pastoral Counseling Services did receive a  25 grant as part of that grant funding to</p>
<p style="text-align: right;">Page 267</p> <p>1 THE VIDEOGRAPHER: On the record,  2 4:13.  3 MS. MORRISON: Thank you  4 Mrs. Patton. I am done with questions. My  5 colleagues in the room are done.  6 Does anyone on the phone have any  7 questions.  8 MS. McINTYRE: Jill McIntyre. I do  9 not.  10 MS. MORRISON: Anyone else?  11 Hearing none, do you have any  12 redirect?  13 MS. KEARSE: Yeah, I'm going to  14 actually take a break and look to see that. I  15 wasn't sure, so let us take our break and we  16 will let you know.  17 THE VIDEOGRAPHER: Off the record,  18 4:14.  19 (A recess was taken.)  20 THE VIDEOGRAPHER: On the record  21 4:46.  22 EXAMINATION OF KIMBERLY PATTON  23 BY MS. KEARSE:  24 Q. Ms. Patton, Anne Kears. Thank you  25 for being here today and answering questions</p>	<p style="text-align: right;">Page 269</p> <p>1 administer Generation Rx curriculum within the  2 Akron Public Schools that they were in.  3 And in 2017, the '17-'18 school  4 year, Kenmore Garfield High School in Akron  5 implemented an athletic prevention program  6 where they also implemented the Generation Rx  7 curriculum amongst athletes in the high school.  8 Q. Okay. And that's -- that's just --  9 fair to say, ADM does provide grant dollars  10 specific to opioid prevention and use within  11 Summit County; is that correct?  12 MS. FEINSTEIN: Objection. Form.  13 A. Yes.  14 Q. Ms. Patton, do you recall a line of  15 questioning from counsel for Teva about when  16 you first learned about a public health crisis  17 in Summit County? Do you recall that?  18 A. Yes.  19 Q. Okay. And as to Summit County  20 specifically, when's the first time that you  21 became aware that Summit County was facing a  22 public health crisis as it relates to opioid  23 use?  24 A. As it relates specific to Summit  25 County, when I became employed with the ADM</p>

<p style="text-align: right;">Page 270</p> <p>1 Board in May of 2016, I, soon after that, saw  2 the impact it was having in our community, in  3 those months soon to follow, whereas many of  4 our systems were becoming overloaded, whereas  5 Summit County Children Services was taking in  6 kids beyond capacity, whether it's because  7 children lost their caregivers to overdose, or  8 if they were in the criminal justice system.  9 We also had mobile morgues  10 delivered and set up within our county at that  11 time, and we were getting calls at the ADM  12 Board at that time, in that -- those summer  13 months of 2016, where people were fearful,  14 calling.  15 I had one individual, a family  16 member call, indicating their family member  17 overdosed four times, and how can they just get  18 them into treatment because they don't want  19 them to die.  20 So as far as Summit County  21 specifically, it really wasn't -- it was when I  22 first became employed with the ADM Board and  23 was working with the ADM Board.  24 MS. FEINSTEIN: I'm going to move  25 to strike the non-responsive portion of that</p>	<p style="text-align: right;">Page 272</p> <p>1 assessed on December 27th, cleared for  2 admission into a residential treatment program  3 on the 9th. We called -- at least scheduled  4 her on the 14th. When we made that phone call,  5 her grandmother, at the time, told us that she  6 had passed away on that Sunday, on the 13th,  7 prior, of an overdose.  8 Q. Has the opioid crisis in Summit  9 County impacted people of all ages?  10 A. I believe so, yes. You know, we  11 have children that have been impacted by this.  12 We have adults, young adults, adults, as well  13 as older adults that are -- have all been  14 impacted by this within the community.  15 Q. Has it impacted people of all  16 races?  17 A. Yes.  18 Q. Socioeconomic statuses?  19 A. Yes.  20 Q. Gender?  21 A. Yes.  22 Q. And is it still the goal of the ADM  23 and as your role as -- in a -- with the ADM to  24 attempt to try and get people into service  25 quicker so that they can perhaps be saved?</p>
<p style="text-align: right;">Page 271</p> <p>1 answer.  2 Q. And regarding the -- well, let me  3 ask you this. To when -- when you came to  4 Summit County, after you came to Summit County,  5 did you see a rise in the number of deaths and  6 people dying of opioid-related use?  7 MS. FEINSTEIN: Objection. Form.  8 A. So when I became employed by Summit  9 County ADM Board, that is when I became aware  10 of the numbers of overdoses within the county.  11 As I mentioned before, it really wasn't on my  12 radar prior to that employment.  13 Q. And as for Summit County, is Summit  14 County still facing an opioid crisis today?  15 A. I believe so.  16 Q. Okay. And do you have a reason  17 to -- what are some examples that you still see  18 today?  19 A. You know, I believe we have done a  20 good job at expanding capacity at our  21 providers, as well as trying to streamline the  22 process to get individuals into services  23 quicker; however, as late as last week, we had  24 an individual, a female, that we were trying to  25 get into residential treatment. She was</p>	<p style="text-align: right;">Page 273</p> <p>1 A. Yes. Our overall goal is to  2 streamline the services as much as possible so  3 that we can get the individuals the services  4 they need as quickly as possible.  5 MS. KEARSE: Okay. Thank you,  6 Ms. Patton. No further questions.  7 MS. FEINSTEIN: I just have a  8 couple of follow-up for you.  9 THE WITNESS: Uh-huh.  10 EXAMINATION OF KIMBERLY PATTON  11 BY MS. FEINSTEIN:  12 Q. The grants that you just testified  13 about in response to the questions from your  14 counsel, do you know the source of the funds  15 for those grants?  16 A. I know it's ADM funding. I don't  17 know specifically what part of the ADM funding  18 it is.  19 Q. Do you know whether Summit County  20 has provided to the ADM any additional funds to  21 fund those grants?  22 A. Can you clarify -- when you say  23 Summit County, because I know we've talked  24 taxpayer money versus government.  25 Q. Sure. So based on your earlier</p>

<p style="text-align: right;">Page 274</p> <p>1 testimony --</p> <p>2 A. Yes.</p> <p>3 Q. -- it's my understanding that you</p> <p>4 know that the ADM Board is funded by a levy?</p> <p>5 A. Correct.</p> <p>6 Q. The grants that you just testified</p> <p>7 about moments ago, do you know whether those</p> <p>8 grants come from the levy funds?</p> <p>9 A. I don't know for sure.</p> <p>10 Q. Do you know whether Summit County</p> <p>11 provides any funds, other than the levy funds</p> <p>12 that are from the designated grant --</p> <p>13 designated levy, does Summit County provide any</p> <p>14 funds specific to the ADM Board for the funding</p> <p>15 of those grants?</p> <p>16 A. Not that I'm aware of.</p> <p>17 Q. How much are the grants that you</p> <p>18 just testified about?</p> <p>19 A. The 2015-'16 grant, I don't know</p> <p>20 that specific dollar amount, because they were</p> <p>21 already awarded prior to me coming on board,</p> <p>22 and I was just responsible for the outcomes.</p> <p>23 The 2017 grant that was issued to</p> <p>24 Kenmore Garfield High School was in the amount</p> <p>25 of \$2,500.</p>	<p style="text-align: right;">Page 276</p> <p>1 BY MR. BOEHM:</p> <p>2 Q. Thank you. Just had to fix the</p> <p>3 microphone so that I could ask you a few</p> <p>4 questions, Ms. Patton. Thank you.</p> <p>5 You indicated that with respect</p> <p>6 specifically to Summit County, it was when you</p> <p>7 became employed in 2016 that you determined</p> <p>8 that there was an opioid abuse epidemic taking</p> <p>9 place in Summit County; is that right?</p> <p>10 MS. KEARSE: Object to form.</p> <p>11 Misstates her testimony.</p> <p>12 A. So when I was -- began my</p> <p>13 employment in May of 2016, that is really when</p> <p>14 I became aware of the opiate crisis within</p> <p>15 Summit County.</p> <p>16 Q. Is it your testimony that the</p> <p>17 opiate crisis within Summit County was already</p> <p>18 underway when you joined the ADAMHS Board in</p> <p>19 2016?</p> <p>20 MS. KEARSE: Object to form.</p> <p>21 Misstates her testimony.</p> <p>22 A. I can't speak as far as because</p> <p>23 I -- as mentioned before, I really did not</p> <p>24 follow Summit County and their ADM Board prior</p> <p>25 to my employment, so I don't know what the</p>
<p style="text-align: right;">Page 275</p> <p>1 Q. Are you aware of any other grants</p> <p>2 that fall in the category of those prevention</p> <p>3 grants?</p> <p>4 A. For the targeted prevention grants,</p> <p>5 there were no other grants, of those grants</p> <p>6 that were opioid-specific.</p> <p>7 Q. The woman that you just told the</p> <p>8 story about who was placed in the residential</p> <p>9 facility but unfortunately did not make it into</p> <p>10 the facility before suffering an overdose, do</p> <p>11 you know whether she overdosed on prescription</p> <p>12 opioids?</p> <p>13 A. I do not know that specifically;</p> <p>14 however, I do know that we are following up to</p> <p>15 get an incident report on the situation.</p> <p>16 Q. What information would you need to</p> <p>17 confirm what she overdosed on?</p> <p>18 A. Ultimately, the tox -- a tox screen</p> <p>19 from the medical examiner would confirm it.</p> <p>20 Part of the unusual incident reporting process,</p> <p>21 though, is the treatment -- treatment provider</p> <p>22 that she was linked with will do a report to</p> <p>23 us, and if there was anything reported to them,</p> <p>24 they can indicate it at that time.</p> <p>25 EXAMINATION OF KIMBERLY PATTON</p>	<p style="text-align: right;">Page 277</p> <p>1 situation was prior to my employment.</p> <p>2 Q. But did you determine, when you</p> <p>3 joined the ADAMHS Board, that the opioid</p> <p>4 epidemic was already underway when you joined?</p> <p>5 MS. KEARSE: Object to form.</p> <p>6 Q. Or do you have no idea one way or</p> <p>7 another?</p> <p>8 A. So I believe when I became employed</p> <p>9 in -- as I had mentioned soon after I became</p> <p>10 employed, I don't know the specific date, but</p> <p>11 that was really when we saw a spike in the</p> <p>12 deaths and the mobile morgue coming, so as far</p> <p>13 as was it a crisis beforehand, I don't know</p> <p>14 what state the county was in prior to me</p> <p>15 becoming employed.</p> <p>16 Q. Have you ever undertaken any effort</p> <p>17 to try and understand when Summit County, the</p> <p>18 trends of prescription opioid abuse and</p> <p>19 overdoses, started to go upward?</p> <p>20 MS. KEARSE: Object to form.</p> <p>21 A. Can you clarify? When you say have</p> <p>22 I ever made --</p> <p>23 Q. Have you ever undertaken any effort</p> <p>24 to try and determine when prescription opioid</p> <p>25 abuse and overdoses started to trend upward in</p>